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IN REPLY REFERENCE: CTO-0128/0169

October 14, 1999

Bechtel

1230 Columbia Street
Suite 400
San Diego, CA 92101-8502

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
1220 Pacific Highway
Building 127, Room 112
San Diego, CA 92132-5190

Subject: CTO-0128: Response to Regulatory Comments on the Revised Draft Engineering Evaluation/Cost Analysis for IRP Site 1, Inactive Landfill, Former Naval Training Center, Proposed Grading Plan, Port of San Diego, Northern Portion of Landfill and Conceptual Models for Consolidation Alternatives, IRP Site 1

Dear Mr. Selby:

Enclosed are five copies of the Response to Regulatory Comments on the Revised Draft Engineering Evaluation/Cost Analysis for IRP Site 1, Inactive Landfill, Former Naval Training Center, Proposed Grading Plan, Port of San Diego, Northern Portion of Landfill and the Conceptual Models for Consolidation Alternatives, IRP Site 1. As directed by the Remedial Project Manager, Ms. Content Arnold, these enclosures will be distributed to regulatory agencies identified on this transmittal /Deliverable Receipt.

If you have any questions, regarding these enclosures please call me at (619) 744-3095 or Kathryn Parker at (619) 744-3046.

Very truly yours,

Jerald F. Bailey
Project Manager

EB:dc
[illegible]

12 October 1999

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from Sylvia M. Castillo

Written Comments on 18 August 1999
Sylvia M. Castillo
Senior Civil Engineer
City of San Diego

GENERAL COMMENT

Comment 1: Page 2-36, "...the LFG did not appear to be migrating off-site to the west, and LFG found within on-site structures was below regulatory criteria." This sounds contradictory. It appears to be migrating if levels were found in the structures. What were the levels found? Were these structures monitored more than once? Are there landfill gas sensors currently installed in those structures?	**Response 1:** The referenced structures are located in the western portion of the landfill, within the landfill boundary. The location of the buildings is noted on Figure 2-17. Figure 2-17 also includes the landfill gas sampling results. The statement that LFG did not appear to be migrating off-site to the west was based on the LFG survey results from the ESI. The vapor probes were located along the western boundary of Site 1. The type of LFG testing performed during the ESI is described on Page 2-35, under the bullet, Landfill Gas Assessment. Explosive-gas testing of the various surface and subsurface structures (mainly drains and vaults) was performed once during the ESI using field instrumentation. A description of the LFG sampling activities performed during the air SWAT can be found in section 2.2.2.4.
Comment 2: Page 4-4, "A minimum of 300 confirmation samples will be collected at the site using a simple random sampling design." This seem to be an extensive amount of samples. Is an analysis for VOC's, SVOC's and Title 22 metals really needed on all of the samples?	**Response 2:** The number of samples collected under Alternative 1 is representative of the entire 51 acres and averages 1 sample per every 100 feet. Typically, regulatory agencies require confirmation sampling every 25 to 50 feet, however, for cost estimating purposes it was assumed fewer samples would be required, given the size of the area and the nature of the waste material. For site closure, it is mandatory that confirmation sampling analysis include every chemical of potential concern at the site. The purpose of the EE/CA is only to compare various alternatives. Specifics, such as the actual number of confirmation samples collected will be addressed in the final design, should this alternative be chosen.
Comment 3: Page 4-8, "If portions of the contaminated soil require stabilization prior to landfill disposal, the disposal facility must conduct testing to select the proper stabilization agents and additives,..." I'm not aware of disposal facilities performing these tests. I would think it would be the generator of the wastes' responsibility.	**Response 3:** The receiving facility reviews the disposal analytical results and may conduct additional testing, if deemed necessary. The disposal facilities are equipped to stabilize soils, if they exceed the Federal waste criteria. Kettleman Hills, located in the central valley, is equipped to stabilize soils.

12 October 1999

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from Sylvia M. Castillo

Comment 4: Page 4-12, "The existing soil cover isolates the landfill waste from precipitation in accordance with applicable prescriptive standards as required by 27 CCR Section 21090(a)." The Ninyo & Moore Investigation identified several areas that have less than 2 feet of cover. "Prescriptive cover" as defined in said section consists of 2 feet of a foundation layer, 1 foot of a low-hydraulic-conductivity layer and 1 foot of an erosion resistant layer. Therefore it does not seem appropriate to call the existing cover applicable to these standards. It may be proposed to RWQCB as an alternative final cover.	**Response 4:** A conceptual grading plan will be provided in the revised final EE/CA. The text will be revised to discuss the conceptual grading plan including how stormwater will be managed and the control of on- and off-site drainage. The grading plan design will be submitted to the regulators prior to implementation of the remedy and after the decision document is signed. The grading design will have a minimum 2-foot cover over the required soil maintenance area. Once the existing soil cover complies with the grading plan and as agreed with the regulatory agencies, the site will be maintained in accordance with General Waste Discharge Requirements, Monitoring and Reporting Program No. 97-11.
Comment 5: Pages 4-15, 4-26, "...the inactive landfill has adequate cover (approximately 2 feet) with a few exceptions that are included in the grading cost." It appears from Figure 2-22 Landfill Cover thickness contours that there are <u>many</u> areas where the cover in less than two feet. Is the cost of purchasing and importing soil part of the grading cost?	**Response 5:** A conceptual grading plan will be provided in the revised final EE/CA and the text will be revised accordingly. The existing stockpiled soil located on-site will be used to bring the existing soil cover into compliance. Cost for additional soil was not included in the revised draft EE/CA. Once the grading plan design is completed, calculations will be performed to determine if additional soil is required to bring the existing soil cover to grade. Currently, the cost for moving the existing stockpiled soil and regrading the site has been included in the cost for Alternatives 2 and 3. Text will be added to the revised final EE/CA to clarify this information.
Comment 6: Pages 4-23, 4-34, Table 4-2 and Table 4-3 Cost Estimates; Are the regulatory agencies (Local Enforcement Agency [LEA] and RWQCB) annual fees included in these cost estimates?	**Response 6:** Any fees required by the regulatory agencies would be included in the contingencies listed in the respective tables.
Comment 7: Page 4-27, Figure 4-3; There is an area on the map within the landfill boundaries that is not identified as "existing cover to be maintained" or "additional asphaltic concrete pavement placement." Since this is within the landfill boundaries it should also be maintained.	**Response 7:** This area will be included as part of the "existing cover to be maintained."

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from Steven W. Anderson

Received by facsimile on 19 August 1999 Steven W. Anderson U.S. EPA Legal	
GENERAL COMMENT	
Comment 1: The Revised Draft EE/CA contains a good analysis of ARARs for each alternative under consideration and the ARARs tables appear to be very comprehensive.	**Response 1:** Thank you for your comment.
Comment 2: Appendix A: Section A2.2 Groundwater and Surface Water ARARs and Table A2-1 Potential Federal Chemical-Specific ARARs by Medium There are statements in Section A2.2 and in several places in the "Comments" column of Table A2 that the groundwater at Site 1 is not a potential source of drinking water. While the State of California considers groundwater not to be a potential source of drinking water if, among other reasons, it contains in excess of 3,000 mg/l total dissolved solids, EPA guidelines may classify an aquifer as a potential source of drinking water if it contains less than 10,000 mg/l total dissolved solids and is capable of yielding 150 gallons per day. The text should state whether groundwater under Site 1 would be classified as a potential source of drinking water under the federal guidelines.	**Response 2:** The text will be revised to state that the groundwater under Site 1 would not be classified as a potential source of drinking water under the federal guidelines, because the groundwater generally exceeds the drinking water standards for total dissolved solids in both Zones A and B (10,200 and 19,200 mg/L, respectively).
Comment 3: Table A4-1 Potential Federal Action-Specific ARARs In Table A4-1, the statement that a particular requirement is "Not an ARAR" is found in the "Comments" column, while in Tables A2-1 and A3-1 it is in the "ARAR Determination" column. The format of Tables A2-1 and A3-1 appears easier to use. I recommend revising Table A4-1 to follow the format of Tables A2-1 and A3-1.	**Response 3:** Table A4-1 will be modified to indicate "Not an ARAR" in the "ARAR Determination" column.

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from Steven W. Anderson

Comment 4: Table A4-1 Potential Federal Action-Specific ARARs Toxic Substances Control Act 15 U.S.C. 2601 et seq. The "ARAR Determination" column for this part of the table should state whether or not TSCA is an ARAR. (The "Comments" column states that there is no PCB contamination at the landfill exceeding 50 ppm.)	**Response 4:** The "ARAR Determination" column will be amended to state that TSCA is not an ARAR.
Comment 5: Table A4-1 Potential Federal Action-Specific ARARs U.S. Department of Transportation, 49 U.S.C. 1802, et seq. The "Comments" column states that these requirements are "potentially relevant and appropriate to the transport of hazardous materials." The comments should state definitely whether the requirement is an ARAR. Where the requirement will be ARAR only on the occurrence of a contingency, the comment should describe the contingency. For example, "Relevant and appropriate if hazardous materials are transported."	**Response 5:** The transportation of hazardous waste ARARs are described as "substantive requirements potentially relevant and appropriate to the transport of hazardous materials." These will be revised to state, "Relevant and appropriate if hazardous materials are transported."
Comment 6: Table A4-2 Potential Federal Action-Specific ARARs: As with Table A4-1, the statement that a particular requirement is "Not an ARAR" is found in the "Comments" column, not in the "ARAR Determination" column. I recommend revising Table A4-2 to follow the format of Tables A2-1 and A3-1.	**Response 6:** Table A4-2 will be revised to follow the format of Tables A2-1 and A3-1.

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from Glenn K. Young

Received by facsimile on 23 August 1999
Glenn K. Young
California Integrated Waste Management Board (IWMB)

GENERAL COMMENT

Comment 1: IWMB staff concur with the RWQCB concerns that an engineered final grading plan needs to be prepared and implemented for the entire site. The plan should show how on-site and off-site drainage will be controlled. The drainage plan should show how stormwater will be managed from the site, such that the "trash-filled" area will not be impacted by run-on and that run-off from the cover of the "trash-filled" area is appropriately managed. The current site maintenance, which includes adding soil to areas to prevent ponding (filling in differential settlement areas) does not meet the requirement for performing grading in accordance with an overall site grading/drainage plan. The emphasis of this plan should be to prevent run-on from occurring from the Least Tern area or the Southern portion (asphalt-paved parking lot), towards the trash-filled areas.	**Response 1:** The purpose of an EE/CA is to evaluate different engineering alternatives. A conceptual grading plan will be provided in the revised final EE/CA. The text will be revised to discuss the conceptual grading plan including how stormwater will be managed and the control of on- and off-site drainage. The grading plan design will be submitted to the regulators prior to implementation of the remedy and after the decision document is signed.
Comment 2: The purpose of the Port Authority's Preconstruction Report (prepared by Ninyo-Moore), was to provide specific waste volume data and types (obtained from potholing and trenching) to realistically estimate costs associated with consolidating waste material on-site or performing off-site clean-closure. The Preconstruction Report fulfilled this objective, whereas the original EE/CA did not provide data, which could be used to perform this analysis. The original EE/CA used a geophysical survey to delineate landfill areas which was found to be inaccurate during trenching and potholing activities. And also did not provide a reasonable estimate of the types of waste to be dealt with, e.g. quantity of ash, quantity of construction debris, quantity of trash, volume of cover to remove, volumes of fill required, etc.	**Response 2:** Findings from the Preconstruction Study (Ninyo & Moore 1998) regarding the landfill boundary, soil cover thickness, impact to groundwater, and general areas of landfill waste are summarized in Section 2.2.2.12. As indicated in Section 4.1.1, waste thickness and types from the Preconstruction Study were used to calculate waste volumes, existing soil cover thickness, and thickness of waste in the revised draft EE/CA.

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from Glenn K. Young

Comment 3: If the trash-fill area is to be left in place indefinitely, IWMB staff recommends that the site data collected in the Ninyo-Moore report be used to develop an on-site consolidation project to reduce the area of the footprint (52 acres) to the trash-filled area only (10 acres). The burn-ash, construction debris and contaminated soil generated could be used as the foundation for capping the trash-filled areas. Clean import could be brought in to backfill cut volumes, e.g. soil cut from the last airport terminal project. This would greatly reduce the clean-closure cost and minimize the overall footprint of the landfill requiring maintenance and monitoring.	**Response 3:** A waste consolidation alternative to reduce the landfill size will be included in the revised final EE/CA. As with the other alternatives, information provided in the Preconstruction Study will be used, where appropriate.
Comment 4: IWMB staff highly recommend a consolidation project alternative in the EE/CA if clean-closure is not pursued, as it will minimize the footprint for maintenance and monitoring, provide positive drainage for the "trash-filled" area of the landfill and provide the Port with a larger fraction of uncontaminated property. The data from the Ninyo-Moore construction report can be used to formulate the project and provide approximate cut and fill quantities necessary to provide the trash-fill areas with a minimum 3% grade.	**Response 4:** A waste consolidation alternative to reduce the landfill size and drainage plan will be included in the revised final EE/CA.
Comment 5: IWMB legal staff has reviewed the draft revised EE/CA and has determined that the following Applicable or Relevant and Appropriate Requirements from IWMB ARARs (see attached IWMB ARARs) be incorporated into the EE/CA, if the remedy selected allows waste to remain on-site: 1) Emergency Response Plan (27 CCR Section 21130) 2) Security (27 CCR Section 21135) 3) Final Cover (27 CCR Section 21140) 4) Final Grades (27 CCR Section 21142) 5) Final Site Face (27 CCR Section 21150) 6) Drainage Protection & Erosion Control (27 CCR Section 21160) 7) Postclosure Maintenance (27 CCR Section 21180) 8) Postclosure Landuse (27 CCR Section 21190)	**Response 5:** The following ARARs will be included into the revised final EE/CA. • Emergency Response Plan (27 CCR Section 21130) • Security (27 CCR Section 21135) • Final Cover (27 CCR Section 21140) • Final Grades (27 CCR Section 21142) • Drainage Protection & Erosion Control (27 CCR Section 21150) • Postclosure Maintenance (27 CCR Section 21180) • Postclosure Land Use (27 CCR Section 21190) Title 27 Section 21130 is an administrative and procedural requirement and therefore, will not be included as an ARAR.

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from Glenn K. Young

IWMB requests these ARARs be incorporated for the NTC Inactive Landfill since the Port Authority will become the site owner and jurisdiction for the inactive landfill will come under the Authority of the Regional Water Quality Control Board, Integrated Waste Management Board and Local Enforcement Agency (City of San Diego). Postclosure maintenance inspections will likely be conducted by the RWQCB per Waste Discharge Requirements for the site and the LEA.	The substantive provisions of 27 CCR Section 21135(f) are relevant and appropriate and will be included. Title 27 Section 21140 is an administrative and procedural requirement and therefore, will not be included as an ARAR. The substantive requirements of 27 CCR Section 21142 are relevant and appropriate and will be included. Section 21150 is Drainage Protection & Erosion Control. There is no section in 27 CCR titled Final Site Face. The substantive requirements of Drainage Protection & Erosion Control (27 CCR Section 21150[a]) are relevant and appropriate and will be included. The substantive requirements of 27 CCR Section 21180(a) are relevant and appropriate and will be included. The substantive requirements of 27 CCR Section 21190 are relevant and appropriate and will be included. Comments on these ARAR requirements will be listed in the appropriate ARARs table in Appendix A of the revised final EE/CA.

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from John P. Anderson

Written Comments on 19 August 1999 John P. Anderson Site Mitigation and Cleanup Unit San Diego Regional Water Quality Control Board	
GENERAL COMMENT	
Comment 1: Please note that you have been previously notified of the signature requirements for draft documents and other appropriate technical reports that require registered professional review. The RWQCB will not continue to review draft or final technical reports without the appropriate registered professional signatures included. California Business and Professions Code Sections 6735, 7835, and7835.1 require that engineering and geologic evaluations and judgements be performed by or under the direction of registered professionals. Please remind your consultants that all, including draft, technical reports (e.g., Engineering Evaluation/Cost Analysis, etc.) must bear the stamp or signature (including license number) of all the appropriate registered professionals. Geologic boring and trench logs must also bear the stamp or signature of a California registered geologist (RG) or certified engineering geologist (CEG) in order to verify proper supervision and to establish responsibility. This is in accordance with the Business and Professional Code, Chapter 12.5 – Geologist and Geophysicists Act Section 7800.	**Response 1:** A registered professional will sign the revised final EE/CA.
SPECIFIC COMMENT	
Comment 1: Section 2.1.3; Regulatory History; Include reference to RWQCB Resolution 59-R20 for Requirements Regulating the Discharge of Wastes from a Sanitary Landfill to be Operated by the United States Marine Corps, San Diego. This permit was issued for the discharge of specified wastes at the former MCRD Landfill (Site 1), and has subsequently been rescinded.	**Response 1:** A reference to RWQCB Resolution 59-R20 for Requirements Regulating the Discharge of Wastes from a Sanitary Landfill to be Operated by the United States Marine Corps, San Diego will be included in Section 2.1.3.
Comment 2: Figure 2-4, Current Sewer and Utility Lines; Please include the location of all existing and inactive utility lines (e.g., original sewer line, etc.).	**Response 2:** Figure 2-4 will be revised to include the location of existing and inactive utility lines (e.g., original sewer line, etc.).

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Comments from John P. Anderson

Comment 3: Section 2.1.7, Sensitive Ecosystems; Please provide the "cooperative agreement to mitigate the loss of the California least tern nesting habitat" for the site, which the U.S. Fish and Wildlife Service (USFWS) and the San Diego Unified Port District entered into on April 1999. Describe any management and/or maintenance requirements, and schedule for implementation at the former NTC site.	**Response 3:** The Fish and Wildlife Service, United States Department of the Interior, and the San Diego Unified Port District, collectively, agreed to enter into a cooperative agreement to protect and enhance nesting and foraging habitats for the endangered California least tern at the salt ponds in South San Diego Bay as mitigation for the loss of the existing least tern colony site at Camp Nimitz, former NTC, San Diego, California. The cooperative agreement generally discusses enhancing least tern nesting habitat and least tern production at a more advantageous location, to offset the loss of the Camp Nimitz site. No management, maintenance requirements, or schedules for implementation at the former NTC site is discussed in the cooperative agreement. A copy of the cooperative agreement is attached for your review. The least tern colony was officially moved to the South San Diego Bay property upon close of escrow of the aforementioned property. As no least tern colony currently exists on the NTC site, no maintenance is required.
Comment 4: Figure 2-13, Distribution of Organic Compounds; Please provide the complete original investigation reference, date completed, etc. of material presented in this and other figures.	**Response 4:** Appropriate references will be included on the figures.
Comment 5: Section 4.1, Alternative 1 – Excavate Landfill Waste and Dispose Off-site; This alternative evaluated "complete removal of all landfill material and residuals" referred to as clean closure. Please include in this evaluation the consolidation and/or partial clean closure options we have discussed in numerous meetings with you and the IWMB.	**Response 5:** An alternative evaluating consolidation will be included in Section 4.
Comment 6: Section 4.2, Alternative 2, and Section 4.3, Alternative 3; The descriptions of Alternatives 2 and 3 include "maintenance of a positive drainage on the soil cover and asphaltic pavement." Based on our meeting on August 3, 1999, we understand that the soil cover maintenance will consist of "rough grading" to promote drainage and minimize infiltration. This is the same type of landfill maintenance, which has been performed by the Navy over the past couple of years.	**Response 6:** A conceptual grading plan is being prepared and will be included in the report. In addition, the text will be revised to denote that the semiannual grading will comply with the waste discharge requirements. Once the grading has been performed, the site will continue to be maintained semiannually in accordance with the waste discharge requirements.

RESPONSE TO REGULATORY COMMENTS ON THE REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, INACTIVE LANDFILL, FORMER NAVAL TRAINING CENTER, SAN DIEGO CTO-0128

Comments from John P. Anderson

Regional Board staff has conducted inspections of the landfill during the rainy season and have noted ponding on the landfill surface, and a failure (differential settlement) of the existing pavement cover. These recent violations resulted in the Regional Board staff issuance of a Notice to Comply, dated December 11, 1997, for failure to maintain the landfill cover, based on the large amount of ponded water on the landfill surface. Ponding seems to be a recurring problem at this landfill. This indicates that the current landfill maintenance program and cover is **inadequate**. Ponding on the landfill surface may infiltrate through the buried waste and cause adverse impacts to ground water and potential adverse impacts to San Diego Bay. The slope of the landfill cover needs to be sufficient to provide adequate run on and runoff protection. In addition, stormwater flows will need to be collected and drained off-site.	
Comment 7: Ground Water Monitoring; Alternatives 2 and 3 indicate that groundwater will be sampled semiannually for 5 years, then annually thereafter for 25 years. The ground water monitoring requirements for Site 1 landfill are contained in the General Waste Discharge Requirements, Monitoring and Reporting Program No. 97-11. If the responsible party wants a reduction in the ground water monitoring frequency, documentation will need to be provided to demonstrate that less frequent ground water monitoring is warranted. Any change in the ground water monitoring program will need to be approved by the Executive Officer.	**Response 7:** For costing purposes only, the estimate was based on semiannual groundwater sampling for 5 years, then annually thereafter for 25 years. It is acknowledged that the San Diego Unified Port District, as the future owner, will be responsible to meet the requirements outlined in General Waste Discharge Requirements, Monitoring, and Reporting Program No. 97-11.
Alternatives 2 and 3 also discuss long-term ground water monitoring, including the detection of leachate. If, in the future, there is a release from the landfill (e.g., ground water quality degrades further) the responsible party (or parties) will need to conduct corrective action. This may include treatment of the ground water or the addition of a prescriptive landfill cover, in accordance with Division 2, Title 27 of the California Code of Regulations. These factors will also need to be included in the cost estimate for the revised EE/CA.	As stated in 27 CCR Section 20380(b), waste discharge requirements for a unit shall contain a provision which requires the discharger to obtain and maintain assurances of financial responsibility for initiating and completing corrective action for all known or reasonably foreseeable releases from the unit. However, if allowable engineered alternatives (27 CCR Section 20380[e]) are in place and if the landfill is maintained accordingly, no known or reasonably foreseeable releases should occur. Possible future corrective actions are not and cannot be addressed in an EE/CA document. There is no possible way to foretell what corrective actions may be required in the future at Site 1. Any possible corrective actions will need to be addressed with future owners, at the time they may occur.

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Comments from John P. Anderson

Comment 8: Appendix A – ARARs; Post-closure maintenance and monitoring ARARs or to-be-considered (TBC) for use in the investigation and cleanup of waste(s) at Site 1 Inactive Landfill, were submitted to Southwest Division Naval, in August 23, 1995; May 22, 1996; and more specific ARARs in November 30, 1998. The following ARARs were not addressed it the revised draft EE/CA:	**Response 8:** The following paragraphs will address the ARARs issues.
1) RWQCB Order No. 95-25, NPDES No. CAG919001, General Waste Discharge Requirements for Groundwater Extraction and Similar Waste Discharges to San Diego Bay and Storm Drains or other conveyance systems tributary thereto. This order establishes procedural requirements and discharge limitations for ground water extraction waste discharges associated with ground water dewatering operations and ground water remediation systems into San Diego Bay and storm drains or other conveyance systems tributary thereto.	Currently dewatering and/or waste discharge to the San Diego Bay and Storm Drains or other conveyance systems are not being considered at Site 1. However, if dewatering and/or waste discharge occur at Site 1 during the removal action, then the substantive requirements of RWQCB Order No. 95-25 are relevant and appropriate.
2) California Toxics Rule (Proposed) will bring California into compliance with Section 303(c)(2)(B) of the Clean Water Act (CWA). Regulatory reference 40 Code of Federal Regulations (CFR) Section 131.38 Federal Register, Vol. 62, No. 150, 42160-42208. This plan will establish numeric criteria for priority toxic pollutants in the State of California for inland surface waters and enclosed bays and estuaries.	Generally, proposed rules and/or legislation are not reviewed when conducting ARARs analyses. The U.S. Environmental Protection Agency (U.S. EPA) expects to promulgate (publish in the Federal Register) the California Toxics Rule (CTR) in the fall of 1999. The SWRCB's revised draft Policy for implementation of the CTR will be released for public review after U.S. EPA's promulgation of the CTR and prior to SWRCB adoption. Based on Fall 1999 CTR promulgation, and the subsequent SWRCB public involvement process associated with a Board Workshop and Board Meeting, Policy adoption is expected around February 2000. Until this process is complete, the proposed rule on the CTR and the SWRCB implementation policies will be evaluated as "to be considered" requirements.
The following comment was submitted verbally at a Base Realignment and Closure Team Meeting held on 03 August 1999:	
Comment 1: It is noted that the "no action" alternative does not include conducting groundwater and landfill gas monitoring. Clarification of the Navy's definition of a "no action" alternative needs to be provided.	**Response 1:** Since the Navy has chosen to perform a removal action at the Inactive Landfill, the "no action" alternative will be removed from the revised final EE/CA.

CTO-128 Former Naval Training Center, San Diego
IR Site 1, Inactive Landfill
Removal Action Alternative
Assumptions for Conceptual Models 1, 2, and 3
October 14, 1999

Conceptual Model 3 is our recommended alternative for consolidation of the Inactive Landfill.

BASIC ASSUMPTIONS:

- The consolidation alternative only considers the northern portion of the Inactive Landfill, which is where the majority of the refuse is located. The southern portion is not included in the consolidation alternative because the proposed reuse of the southern portion is for parking facilities. The waste located in the vicinity of the southern portion is primarily demolition debris and should not pose any problems with the proposed reuse.
- Slope calculations were typically based on the minimum height requirement by the distance from center of the proposed cover to existing grade.
- Minimum height requirements are above existing grade reference.
- The numbers denoted by "*" were based on rough calculations to determine how much overburden was to be removed from the consolidated portion and how much waste was to be brought into the consolidated portion of the landfill from surrounding areas. In addition, data collected from the Ninyo & Moore (1998) Preconstruction Report was used to estimate average depth of both waste and overburden across the northern portion of the Inactive Landfill. Final cost assumptions will be based on the size, height, and slope provided above.

CONCEPTUAL MODEL 1 (Figure 1)

- Size: 1200 feet by 600 feet (approximately 15 acres)
- Calculated minimum slope: 1.5 % (east to west) by 3% (centerline of the proposed landfill cover to existing grade in the north and south directions)
- Minimum height requirement: 9 feet (includes a minimum 2 foot final cover)
- Approximately 63,000* cubic yards of waste to be consolidated
- This model provides adequate room to accommodate all waste under the cover.

CONCEPTUAL MODEL 2 (Figure 2)

- Size: 600 feet by 600 feet (approximately 8.3 acres)
- Calculated minimum slope: 4% (both ways)
- Minimum height requirement: 11.8 feet (includes a minimum 2 foot final cover)
- Approximately 64,000* cubic yards of waste to be consolidated
- This model does not provide adequate room for all waste. In order to accommodate the waste, the height and sidewalls would have to be extended in a vertical manner, which is not a favorable alternative.

CONCEPTUAL MODEL 3 (Figure 3)

- Size: 740 feet by 600 feet (approximately 10.2 acres)
- Calculated minimum slope: 3% (both ways)
- Minimum height requirement: 9 feet (includes a minimum 2 foot final cover)
- Approximately 43,000* cubic yards of waste to be consolidated
- This model provides adequate room to accommodate all waste.

LEGEND:

- CPT BORING OR TRENCH LOCATIONS (N&M 1998)
- SHORE
- FENCE
- ROADS
- DIRT ROADS
- BASE BOUNDARY
- LANDFILL BOUNDARY
- BUILDINGS
- PROPOSED CONSOLIDATED LANDFILL COVERAGE
- APPROXIMATE AREA OF BURNED BURIED REFUSE
- APROXIMATE AREA OF BURIED REFUSE
- APPROXIMATE AREA OF CONSTRUCTION AND/OR LANDFILL DEBRIS

T-98 TRENCH
GB-8 GEOTECHNICAL BORING
CPT-9 CONE PENETRATING TEST SOUNDINGS

ALL OTHERS ARE ENVIRONMENTAL DIRECT PUSH BORINGS (i.e., A, B, C, C/B, D, D/C, E, E/D, F, F/E, ect)

N

200 0 200 Feet

SOURCE: TRENCHING AND DIRECT-PUSH CONDUCTED BY NINYO & MOORE DURING THE PRECONSTRUCTION STUDY (N&M 1998)

Revised EE/CA

Figure 1

Conceptual Model 1

Naval Training Center, San Diego, California

Bechtel National, Inc.
CLEAN II Program

Date: 10/13/99
File No: conceptualmodels
Job No: 22214-128
Rev No: B

LEGEND:

- CPT BORING OR TRENCH LOCATIONS (N&M 1998)
- SHORE
- FENCE
- ROADS
- DIRT ROADS
- BASE BOUNDARY
- LANDFILL BOUNDARY
- BUILDINGS
- PROPOSED CONSOLIDATED LANDFILL COVERAGE
- APPROXIMATE AREA OF BURNED BURIED REFUSE
- APROXIMATE AREA OF BURIED REFUSE
- APPROXIMATE AREA OF CONSTRUCTION AND/OR LANDFILL DEBRIS

T-98 TRENCH
GB-8 GEOTECHNICAL BORING
CPT-9 CONE PENETRATING TEST SOUNDINGS

ALL OTHERS ARE ENVIRONMENTAL DIRECT PUSH BORINGS (i.e., A, B, C, C/B, D, D/C, E, E/D, F, F/E, ect)

N

200 0 200 Feet

SOURCE: TRENCHING AND DIRECT-PUSH CONDUCTED BY NINYO & MOORE DURING THE PRECONSTRUCTION STUDY (N&M 1998)

Revised EE/CA

Figure 2

Conceptual Model 2

Naval Training Center, San Diego, California

Bechtel National, Inc.
CLEAN II Program

Date: 10/13/99
File No: conceptualmodels
Job No: 22214-128
Rev No: B

LEGEND:

- CPT BORING OR TRENCH LOCATIONS (N&M 1998)
- SHORE
- FENCE
- ROADS
- DIRT ROADS
- BASE BOUNDARY
- LANDFILL BOUNDARY
- BUILDINGS
- PROPOSED CONSOLIDATED LANDFILL COVERAGE
- APPROXIMATE AREA OF BURNED BURIED REFUSE
- APROXIMATE AREA OF BURIED REFUSE
- APPROXIMATE AREA OF CONSTRUCTION AND/OR LANDFILL DEBRIS

T-98 TRENCH
GB-8 GEOTECHNICAL BORING
CPT-9 CONE PENETRATING TEST SOUNDINGS

ALL OTHERS ARE ENVIRONMENTAL DIRECT PUSH BORINGS (i.e., A, B, C, C/B, D, D/C, E, E/D, F, F/E, ect)

N

200 0 200 Feet

SOURCE: TRENCHING AND DIRECT-PUSH CONDUCTED BY NINYO & MOORE DURING THE PRECONSTRUCTION STUDY (N&M 1998)

Revised EE/CA

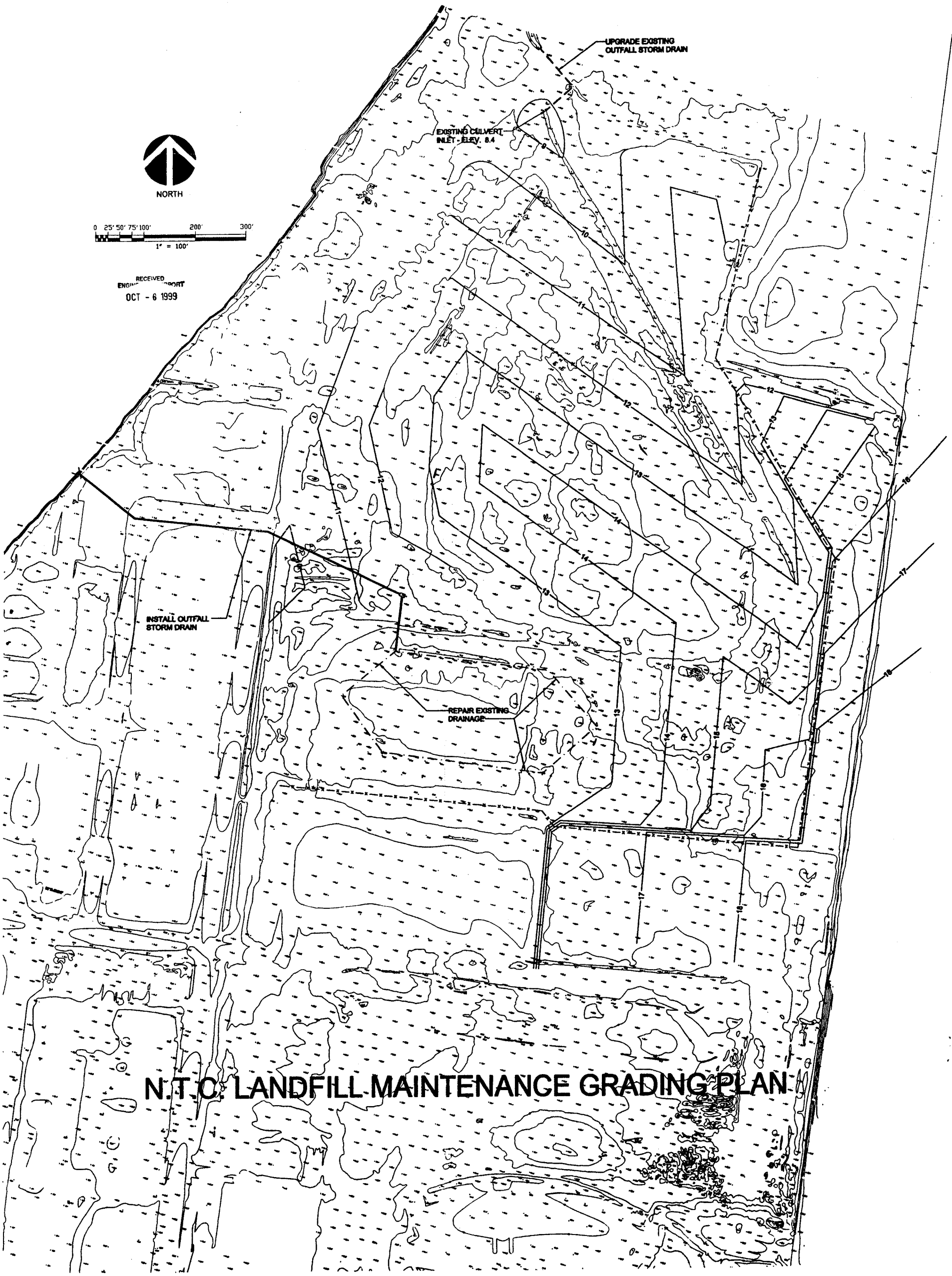
Figure 3

Conceptual Model 3

Naval Training Center, San Diego, California

Bechtel National, Inc.
CLEAN II Program

Date: 10/13/99
File No: conceptualmodels
Job No: 22214-128
Rev No: B



N.T.C. LANDFILL MAINTENANCE GRADING PLAN

BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670 **Document Control No.** CTO-0128/0169

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA. 92132-5190

DATE: October 14, 1999
CTO #: 0128
LOCATION: NTC San Diego

FROM: _____
Jerald F. Bailey, Project Manager

DESCRIPTION: Response to Regulatory Comments on Revised Draft Engineering Evaluation/Cost Analysis for IRP Site 1, Inactive Landfill, Proposed Grading Plan, Port of San Diego, Northern Portion of Landfill and Conceptual Models for Consolidation Alternatives, IRP Site 1 dated - 10/99

TYPE: ___ Contract Deliverable X CTO Deliverable ___ Change Notice/Project Note
Other

VERSION: N/A (e.g., Draft, Draft Final, Final, etc.) REVISION #: 0

ADMIN RECORD: Yes [1] X No ___ Category: ___ Confidential: ___
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